

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/6/2020

April 4, 2020

BY ECF

Hon. Mary Kay Vyskocil
United States District Court Judge
for the Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Navarro, et al.
20-CR-00160
Request for Bail Modification by Defendant Kristian Rhein

Dear Judge Vyskocil:

We represent Kristian Rhein, a defendant in the above-captioned matter. Mr. Rhein originally appeared before Magistrate Judge Ona T. Wang on March 9, 2020. At that time, the Government requested, and the Court agreed, that the bail conditions for release would include a \$100,000 surety bond secured by two sureties.

By letter motion dated March 18, 2020, we asked this Court to modify the bail conditions allowing the defendant to replace the obligation of one surety with a Confession of Judgment in the amount of \$100,000, representing the bond amount, to be filed against the defendant's residence. The Court granted our request for modification, and the defendant has since filed a Confession of Judgment against his property.

Unfortunately, the Confession of Judgment has had an unanticipated adverse effect on Mr. Rhein's credit. I have discussed the matter with the Government, and they have consented to an application by Kristian Rhein to return the bail conditions to those set at his appearance before Judge Wang on March 9, 2020. I am sorry to burden this Court by filing this new bail modification request. I understand how busy the Court is given the complexity of this case. However, these are difficult times. The defendant would respectfully request that the Court grant

Hon. Mary Kay Vyskocil

April 4, 2020

Page 2

a modification to his bail conditions replacing the requirement for a Confession of Judgment with a second surety, the remaining conditions to remain the same.

On Friday, April 3, 2020, I received proof that Christina Rhein, the defendant's mother, who is approved by the Government as a surety, has fully executed the required surety bond and represents the second surety we have secured in this case.

For the reasons set forth above, we ask this Court to modify the bail conditions as set forth herein.

Thank you.

Respectfully submitted,

/S/ (CN)

STEPHEN P. SCARING

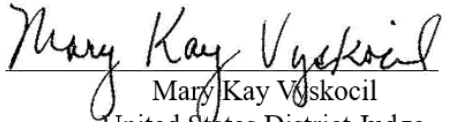
Enclosures

cc: AUSA Andrew Adams (by ECF)

SPS/cn

Granted. SO ORDERED.

Date: 4/6/2020
New York, New York


Mary Kay Vyskocil
United States District Judge